

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

MOUNTAIN EXPRESS OIL COMPANY, et al.,

Debtors.¹

Chapter 11

Case No. 23-90147 (DRJ)

(Jointly Administered)

**CERTIFICATE OF COUNSEL TO DEBTORS' APPLICATION FOR AUTHORITY
TO (I) EMPLOY AND RETAIN FTI CONSULTING, INC., (II) DESIGNATE
MICHAEL HEALY TO SERVE AS CHIEF RESTRUCTURING OFFICER, AND
(III) PROVIDE ADDITIONAL PERSONNEL FOR DEBTORS**

(Related Docket No. 282)

The undersigned hereby certifies as follows:

1. On April 14, 2023, the *Application for Authority to (I) Employ and Retain FTI Consulting, Inc., (II) Designate Michael Healy to Serve as Chief Restructuring Officer, and (III) Provide Additional Personnel for Debtors* [Docket No. 282] (the "Application") was filed with the Court by the above-captioned debtors and debtors in possession (the "Debtors"). The deadline to file objections to the relief requested in the Application was May 5, 2023 (the "Objection Deadline").

2. After the filing of the Application, the Office of the United States Trustee provided certain informal comments to the proposed order approving the Application, which informal comments were addressed and resolved through revisions reflected in the attached revised proposed order attached hereto. A redline reflecting changes to the proposed order is also attached hereto.

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at www.kccllc.net/mountainexpressoil. The location of Debtor Mountain Express Oil Company's principal place of business and the Debtors' service address in these Chapter 11 Cases is 3650 Mansell Road, Suite 250, Alpharetta, GA 30022.

3. The undersigned counsel hereby certifies that the revised proposed order attached hereto resolves all known formal and informal comments received, and that no answer, objection, or other responsive pleading to the Application appears on the Court's docket.

Dated: May 8, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Michael D. Warner

Michael D. Warner (TX Bar No. 00792304)
Steven W. Golden (TX Bar No. 24099681)
440 Louisiana Street, Suite 900
Houston, TX 77002
Telephone: (713) 691-9385
Facsimile: (713) 691-9407
mwarner@pszjlaw.com
sgolden@pszjlaw.com

-and-

Jeffrey N. Pomerantz (admitted *pro hac vice*)
Jeffrey W. Dulberg (admitted *pro hac vice*)
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067
Telephone: (310) 277-6910
Facsimile: (310) 201-0760
jpomerantz@pszjlaw.com
jdulberg@pszjlaw.com

Proposed Counsel to the Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of May, 2023, a true and correct copy of the above and foregoing has been served on all parties that are registered to receive electronic transmission through this Court's CM/ECF filing system in these cases.

/s/ Michael D. Warner

Michael D. Warner